

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) ZM QUANT INVESTMENT LTD,  
(2) BAIJUN OU, a/k/a “Eric Ou”, and  
(3) RUIQI LIU, a/k/a “Ricky Lau”,

Defendants

Criminal No. 24CR10187

**UNDER SEAL**

CERTIFICATION OF RELATEDNESS

The United States of America hereby certifies that the Indictment is one of several interrelated cases and investigations and constitutes a “Related Criminal Case” pursuant to Local Rule 40.1(h). The related cases include but are not necessarily limited to the following matters already pending before the Court: *United States v. Hernandez*, 23-cr-10135-AK (under seal), *United States v. Armand*, 24-cr-10014-AK (under seal), and *United States v. Thompson*, 23-cr-10325-AK (under seal). The above-captioned matter is related to those cases in that the cases arise out of overlapping “charged schemes” and an overlapping “series of events.” L.R. 40.1(h)(1)(A). Additionally, based on the common schemes, events, and individuals involved, it would entail “substantial duplication of effort in the pretrial, trial and/or sentencing phases” if the cases were “heard by different judges.” L.R. 40.1(h)(1)(B).

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/ Christopher J. Markham  
CHRISTOPHER J. MARKHAM  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that an electronic copy of this document was provided to the Court and counsel for the defendant.

/s/ Christopher J. Markham  
CHRISTOPHER J. MARKHAM  
Assistant United States Attorney

Date: June 27, 2024